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## MEMO ENDORSED

August 30, 2023

**VIA ECF**

Hon. Edgardo Ramos  
United States District Judge  
United States District Court for the  
Southern District of New York  
40 Foley Square, Courtroom 619  
New York, New York 10007

The conference is hereby adjourned to September 7, 2023 at 10:30 a.m. The parties are reminded to dial 877-411-9748 and enter access code 3029857# when prompted. SO ORDERED.



Edgardo Ramos, U.S.D.J.  
Dated: August 30, 2023  
New York, New York

Re: Wells Fargo Bank, N.A. v. 3708 Vestal Pkwy E., LLC, *et al.*  
Civil Action No.: 1:22-cv-04714-ER (S.D.N.Y.)

Dear Judge Ramos:

We represent defendants 3708 Vestal Pkwy E., LLC (“Borrower”), Olga J. Tsunis and George Tsunis (collectively, “Defendants”) in the above-referenced action. Your Honor issued an order scheduling a pre-motion conference to be held on September 5, 2023, at 2:30 p.m. (ECF No. 52). Unfortunately, I have a conflict with a court appearance that predated this conference and expect to be unable to dial into the conference at the scheduled time.

We have conferred with plaintiff’s counsel, who is amenable to rescheduling and has advised of availability on the afternoon of September 6, 2023, which is a date and time in the same week as the originally scheduled conference. We respectfully request that the Court adjourn the pre-motion conference to the proposed date and time, or such other date and time as may please the Court.

This is the first request for an adjournment of the pre-motion conference.

Your Honor’s courtesy and attention to this matter are greatly appreciated.

Respectfully,

*Jeffrey A. Miller*

Jeffrey A. Miller

cc: All counsel of record (via ECF)